

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

DAVID P. DONOVAN,

Plaintiff,

v.

BETH A. WILKINSON,

Defendant.

Civil Action No. 1:20-cv-1344

CONSENT MOTION FOR EXTENSION OF TIME

Plaintiff David P. Donovan (“Plaintiff”), pursuant to Local Rule 7 and the Court’s November 25, 2020 Order (ECF 68), respectfully requests that the Court extend the deadline for all parties to file objections or seek other appropriate relief, if any, to the Court’s November 25, 2020 Order (“Order”) until December 16, 2020. In support of this consent motion, Plaintiff states as follows:

1. Pursuant to Federal Rule of Civil Procedure 72(a), “[a] party may serve and file objections to [an] order within 14 days after being served with a copy.” Accordingly, the deadline for Plaintiff and Wilkinson to file objections, if any, to the Order is December 9, 2020.

2. PFI advised the parties that it intends to move to intervene in this action for the limited purpose of asserting privileges and privacy or related interests over matters that are subject to the Order. It is anticipated that PFI will be filing a motion to intervene with the Court shortly.

3. Previously, Plaintiff and Wilkinson engaged in a meet and confer process pursuant to which they sought to reach agreement on the submission of redacted documents to be filed in the public record pursuant to the Court’s Order.

4. While the parties met and conferred extensively in good faith, they could not fully agree on all redactions, including whether information protected from disclosure pursuant to the attorney-client privilege applied to certain materials over which PFI may assert privilege or other privacy or related interests.

5. Given the newly expected motion to intervene by PFI for the purpose of asserting its privileges and privacy or related interests, Plaintiff would like to defer his time to assert objections, if any, pending PFI's entry into the case, if allowed by the Court, to work towards global resolution of its assertion of privileges and privacy or related interests without unnecessary contested objections or motion practice.

6. Accordingly, Plaintiff respectfully requests that the Court grant a 7-day extension, until December 16, 2020, for the parties or interested third parties to potentially file objections to the Order. Good cause exists to grant this extension of time so that PFI can prepare and file its motion to intervene and thereafter review and analyze the Order and related documents to determine whether objections are necessary to preserve any privileges, privacy or any other interests.

7. Wilkinson consents to the relief sought by this Motion.

8. Accordingly, Plaintiff respectfully requests that the Court extend the deadline to file objections pursuant to FRCP 72(a) to December 16, 2020. A proposed order is filed herewith.

**THE PARTIES CONSENT TO SUBMISSION OF THIS MOTION
TO THE COURT WITHOUT A HEARING.**

Respectfully submitted, this 8th day of December, 2020,

/s/ Cathy A. Hinger

Cathy A. Hinger (VSB No. 46293)
Lela M. Ames (VSB No. 75932)
Claire J. Rauscher (Admitted Pro Hac Vice)
Ana L. Jara (Admitted Pro Hac Vice)
WOMBLE BOND DICKINSON (US) LLP
1200 Nineteenth Street, N.W.
Suite 500
Washington, DC 20036
Telephone: 202-857-4489
Facsimile: 202-261-0029
Email: cathy.hinger@wbd-us.com
Email: lela.ames@wbd-us.com
Email: claire.rauscher@wbd-us.com
Email: ana.jara@wbd-us.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of December, 2020, a true and correct copy of the foregoing motion was filed with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Cathy A. Hinger
Cathy A. Hinger, Esq.